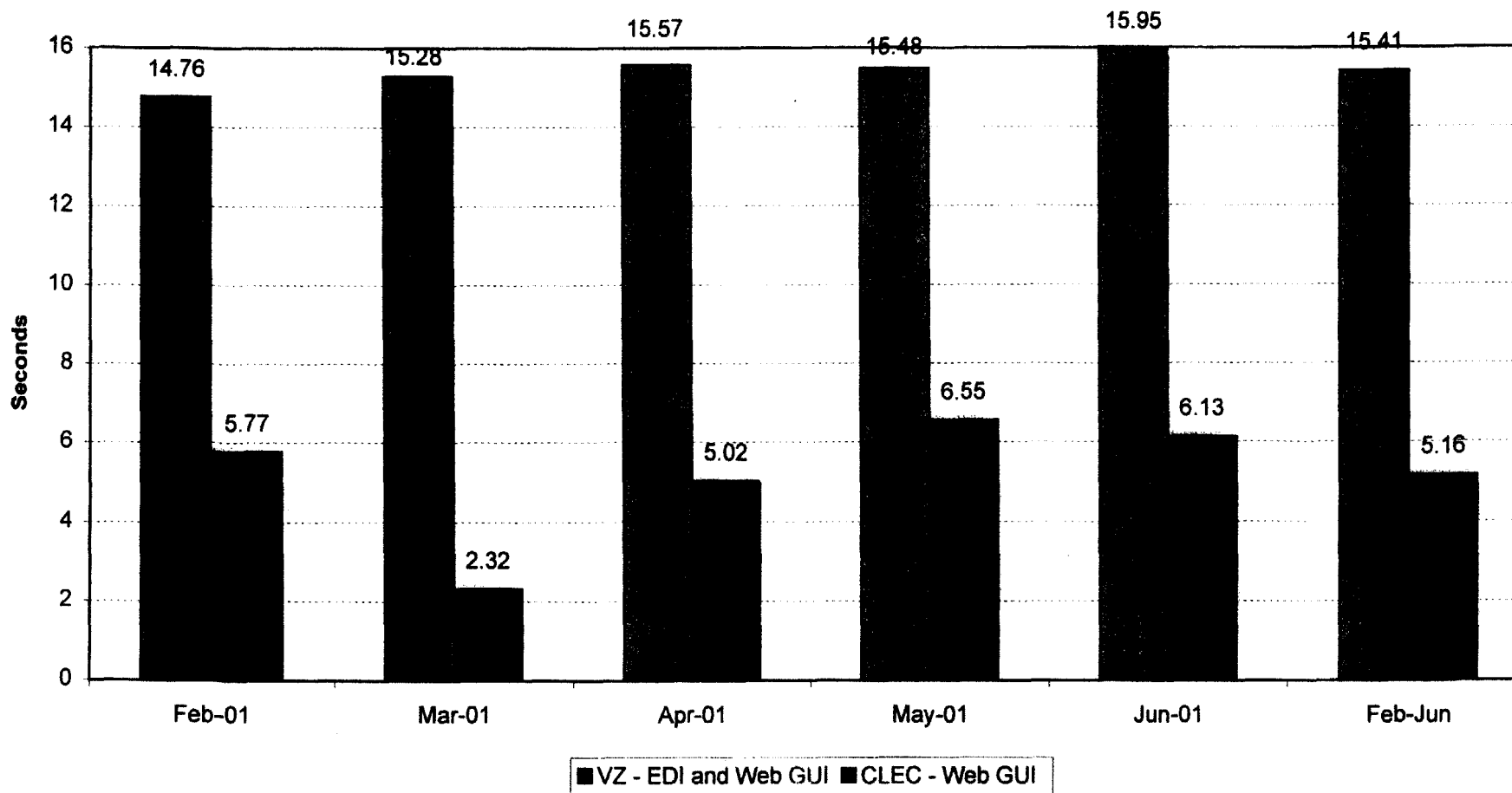


**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 15

Pennsylvania - DSL
Pre-ordering - Average Response Time - Facility Availability - ADSL Loop Qualification
EDI and Web GUI (PO-1-06)
Feb - Jun 01



Pennsylvania - DSL
Pre-ordering - Average Response Time - Facility Availability - ADSL Loop Qualification
EDI and Web GUI (PO-1-06)
Feb - Jun 01

PO-1-06

Feb-01 Mar-01 Apr-01 May-01 Jun-01 Feb-Jun

VZ - EDI and Web GUI Performance

14.76	15.28	15.57	15.48	15.95	15.41
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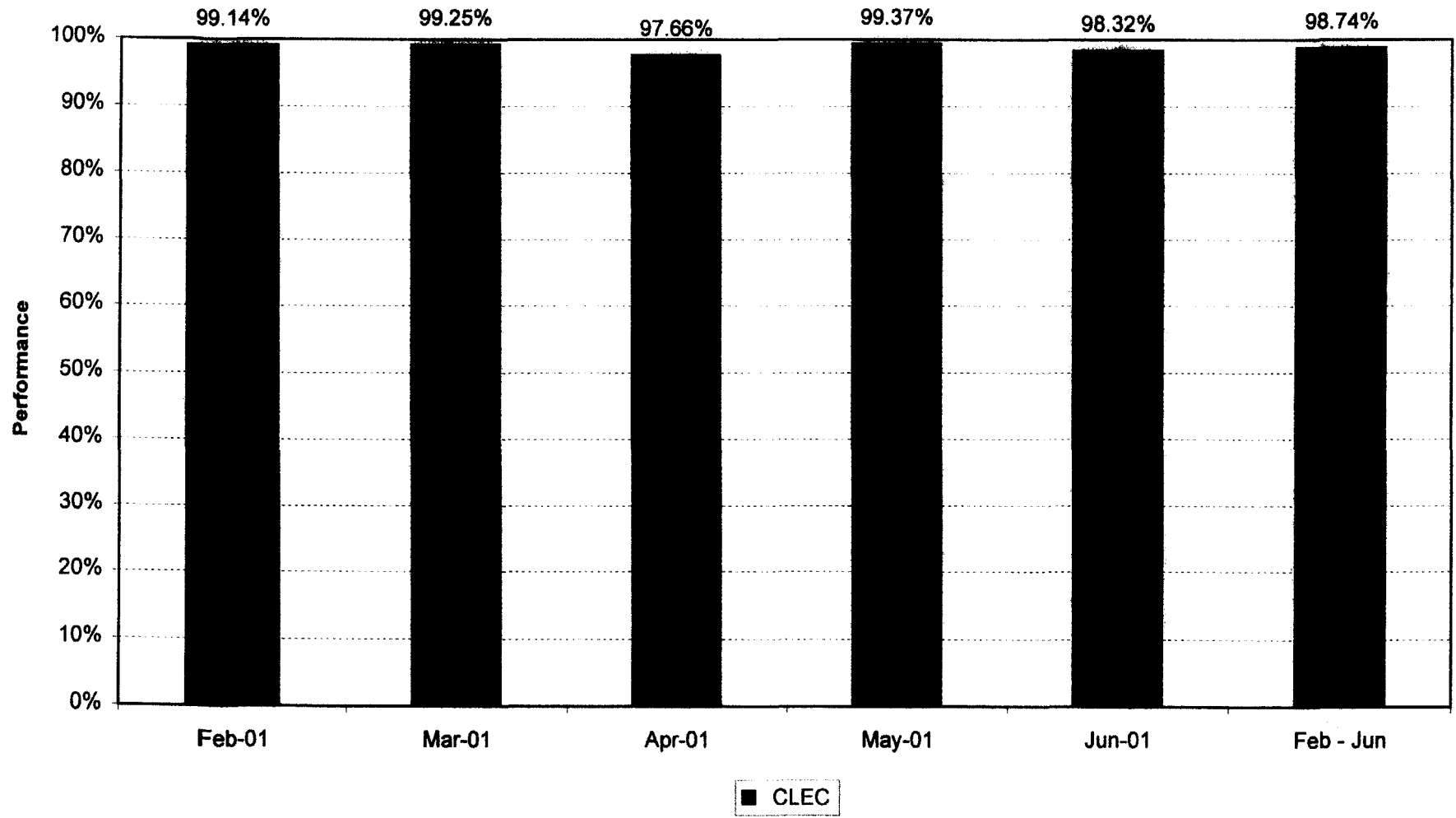
CLEC - Web GUI Performance

5.77	2.32	5.02	6.55	6.13	5.16
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**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 16

Pennsylvania - DSL
Ordering - % On Time LSRC < 6 Lines - Electronic (No Flow-Through) (OR-1-04)
Feb - Jun 01



Pennsylvania - DSL
Ordering - % On Time LSRC < 6 Lines - Electronic (No Flow-Through) (OR-1-04)
Feb - Jun 01

OR-1-04

CLEC
Performance
Observations

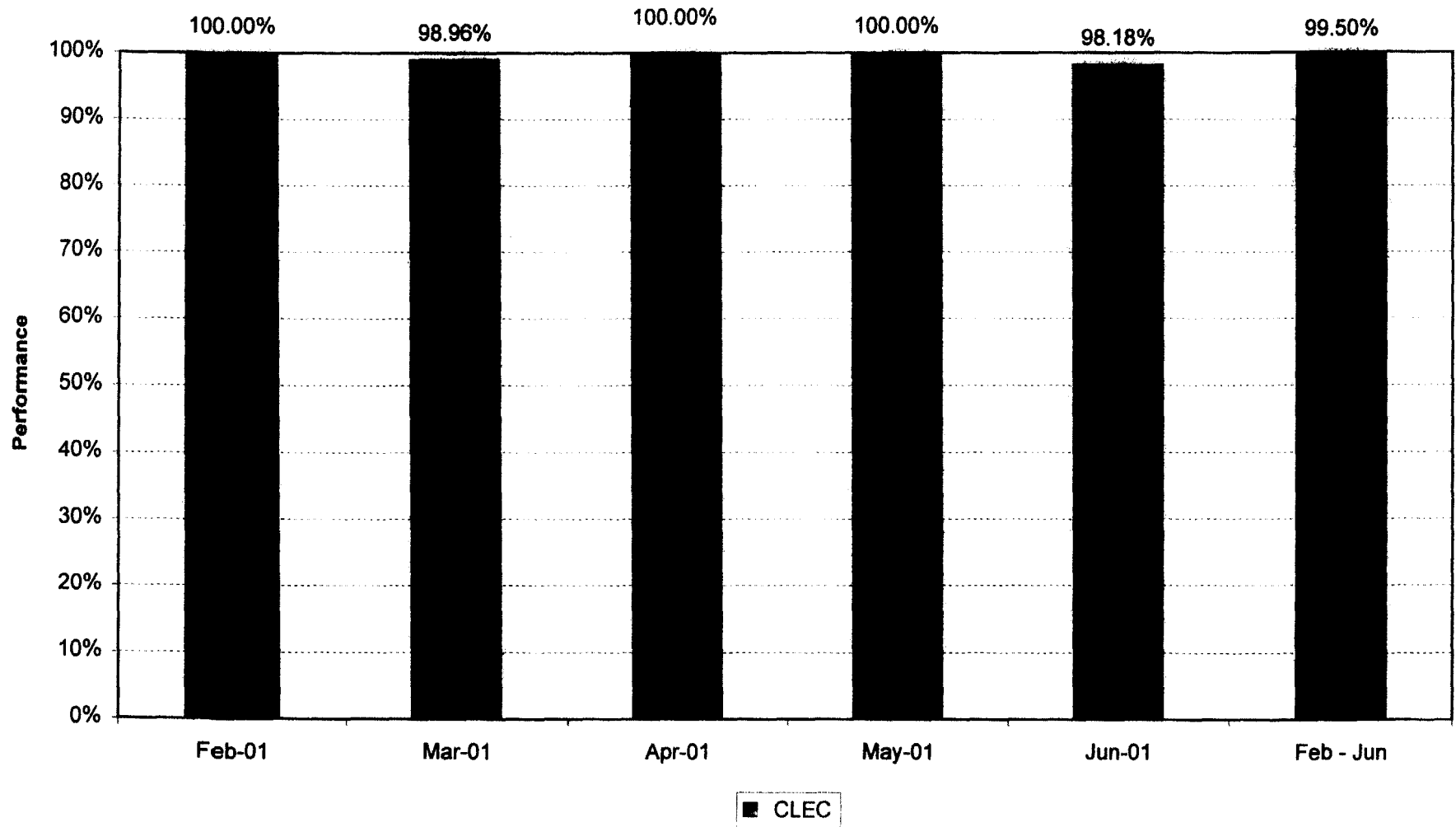
Feb-01 Mar-01 Apr-01 May-01 Jun-01 Feb - Jun

99.14%	99.25%	97.66%	99.37%	98.32%	98.74%
351	402	342	159	179	1433

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 17

Pennsylvania - DSL
Ordering - % On Time LSR Reject < 6 Lines - Electronic (No Flow-Through) (OR-2-04)
Feb - Jun 01



Pennsylvania - DSL
Ordering - % On Time LSR Reject < 6 Lines - Electronic (No Flow-Through) (OR-2-04)
Feb - Jun 01

OR-2-04

CLEC
Performance
Observations

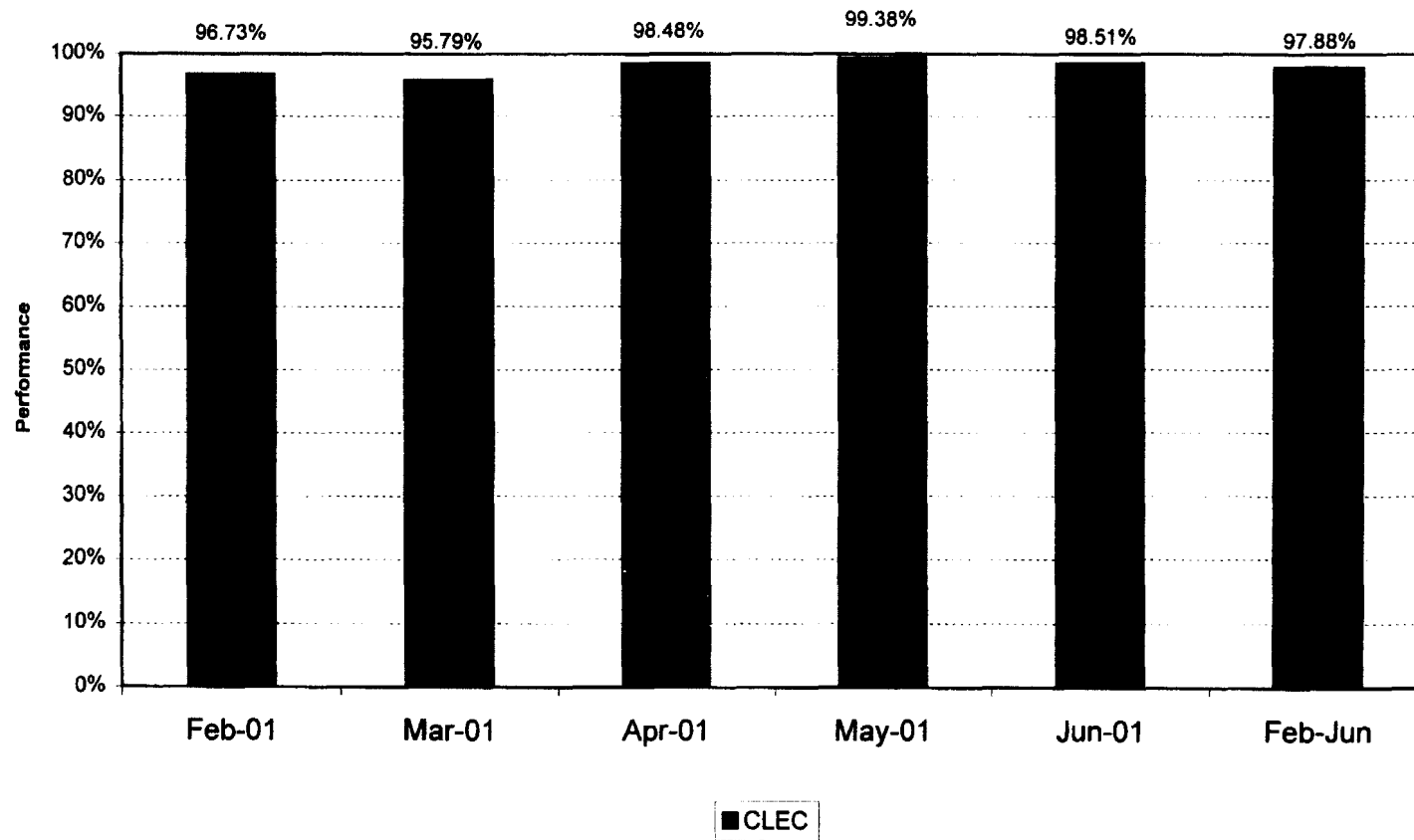
Feb-01 Mar-01 Apr-01 May-01 Jun-01 Feb - Jun

100.00%	98.96%	100.00%	100.00%	98.18%	99.50%
194	194	112	52	55	607

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 18

**Pennsylvania - DSL
Provisioning - % Appointment Met - Verizon - Dispatch (Inverse Of PR-4-04)
Feb - Jun 01**



Pennsylvania - DSL
Provisioning - % Missed Appointments - Verizon - Dispatch (PR-4-04)
Feb - Jun 01

PR-4-04

Feb-01 Mar-01 Apr-01 May-01 Jun-01 Feb-Jun

CLEC Aggregate Performance Observations

3.27%	4.21%	1.52%	0.62%	1.49%	2.12%
825	808	1117	967	806	4523

Inverse of PR-4-04 (% Appointments Met)

CLEC Performance

96.73%	95.79%	98.48%	99.38%	98.51%	97.88%
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**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 19

REDACTED – FOR PUBLIC INSPECTION

Julia A. Conover
Vice President and General Counsel
Pennsylvania



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Julia A. Conover@Verizon.Com

August 6, 2001

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Performance Metrics And Remedies, Docket No. P-00991643

Dear Secretary McNulty:

Verizon Pennsylvania, Inc. ("Verizon PA") would like to inform the Commission of two errors it has discovered in Carrier to Carrier Reports previously filed with this Commission.

First, we discovered that a credit Verizon issued to Z-Tel in February 2001 for claims in 2000 was not included in the proper metric for the February data month Carrier to Carrier report. When the credit was issued, it was recorded on an input screen that would allow for display of an explanation of the adjustment on the bill when the bill was produced, rather than on the screen normally used for credits. As a result, the system sent the data to the metrics repository as a non-recurring charge. Non-recurring charges are used in the calculation of metric BI-8, and the credit was included there. (BI-8 is calculated on a "net" basis, so the credit is not readily observable). Verizon has discovered that certain other credits containing explanations were also recorded in the same manner and also routed to metric BI-8. Verizon has now taken steps to ensure that credits with explanations will be shown in the metrics under BI-3, and will be providing the

Julia A. Conover
August 6, 2001

Commission and Z-Tel (and any other affected CLECs) with the corrected metric information as soon as it has been recalculated.

Second, during our investigation of Covad's claims in the 271 proceeding before the FCC, we discovered a Verizon system programming error that caused some standard interval orders to be excluded from the calculation of Verizon's DSL and line sharing measures. The affected orders were those orders that Verizon received after 5:00 p.m. The programming error treated these orders as having been received that day, rather than the following day. As a result, these orders were treated as having requested an interval one day longer than the standard interval, when in fact they had requested the standard interval. These orders were therefore excluded from the calculation of Verizon's performance under the interval measures. Additionally, we found that less than one percent of VADI line sharing orders were improperly counted as CLEC line sharing orders for the line sharing interval measures in the months of May and June. This error impacted only May and June performance because in May, Verizon adopted a new method to track line sharing performance, and the counting error was associated with migrating to that new method.

Verizon has recalculated its performance under the interval measures by including the orders that had been improperly excluded. That recalculation is attached hereto. In the majority of cases, Verizon's performance is comparable to or better than the performance that had been reported previously.

For example, in May, Verizon's recalculated performance for DSL under PR-2-02 is 5.81 days, rather than 5.82 days as previously reported on the Carrier-to-Carrier report. The number of observations, however, increased from 359 to 511. However, in some cases, where the number of observations was small, there was some change in the performance results.

These issues will also be included in the issues matrix that Verizon PA submits with its monthly Carrier To Carrier Reports. Please contact me if you have any questions about either of these matters.

Very truly yours,

Julia A. Conover

Cc: Bob Rosenthal
Maryanne Martin, Esq.
Attached Service List

**Recalculation of Specific Performance Standards
Pennsylvania - January through June 2001**

Complex Services - 2 Wire xDSL Line Sharing

PR 1-01-3343			
Jan	VADI		2.72
	CLEC	30	2.92
Feb	VADI		2.49
	CLEC	53	2.80
Mar	VADI		3.01
	CLEC	43	4.72
Apr	VADI		3.63
	CLEC	36	3.14
May	VADI		3.02
	CLEC	81	3.11
Jun	VADI		3.01
	CLEC	125	4.55

PR 2-01-3343			
Jan	VADI		3.54
	CLEC	38	7.61
Feb	VADI		3.15
	CLEC	75	4.16
Mar	VADI		2.92
	CLEC	31	8.65
Apr	VADI		3.35
	CLEC	26	4.19
May	VADI		2.90
	CLEC	63	2.90
Jun	VADI		2.97
	CLEC	107	3.10

PR 3-03-3343			
Jan	VADI		89.81%
	CLEC	38	71.05%
Feb	VADI		97.85%
	CLEC	75	96.00%
Mar	VADI		97.25%
	CLEC	31	83.87%
Apr	VADI		82.50%
	CLEC	26	76.92%
May	VADI		98.76%
	CLEC	64	95.31%
Jun	VADI		98.51%
	CLEC	107	95.33%

Complex Services - 2 Wire xDSL Loops

PR 1-02-3342			
Jan	VZ		
	CLEC	639	5.88
Feb	VZ		
	CLEC	483	5.81
Mar	VZ		
	CLEC	508	6.02
Apr	VZ		
	CLEC	840	5.85
May	VZ		
	CLEC	633	6.13
Jun	VZ		
	CLEC	440	6.04

PR 2-02-3342			
Jan	VZ		
	CLEC	427	7.58
Feb	VZ		
	CLEC	355	6.03
Mar	VZ		
	CLEC	388	5.77
Apr	VZ		
	CLEC	687	5.53
May	VZ		
	CLEC	511	5.81
Jun	VZ		
	CLEC	333	5.70

PR 3-10-3342			
Jan	VZ		
	CLEC	431	81.90%
Feb	VZ		
	CLEC	359	93.04%
Mar	VZ		
	CLEC	389	94.74%
Apr	VZ		
	CLEC	816	97.30%
May	VZ		
	CLEC	528	95.27%
Jun	VZ		
	CLEC	338	94.97%

PR 3-11-3342			
Jan	VZ		
	CLEC	802	92.77%
Feb	VZ		
	CLEC	587	98.66%
Mar	VZ		
	CLEC	631	96.51%
Apr	VZ		
	CLEC	1110	98.65%
May	VZ		
	CLEC	633	97.00%
Jun	VZ		
	CLEC	694	97.98%

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**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 20

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**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 21

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